

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

11 MAY 17 PM 1:17

Gloria Taylor

(Name of plaintiff or plaintiffs)

v.

CIVIL ACTION NO. _____

Sedgwick CMS

(Name of defendant or defendants)

COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the Court by 42 U.S.C. §2000e-5. Equitable and other relief are also sought under 42 U.S.C. §2000e-5(g).

2. Plaintiff, _____

Gloria Taylor
(name of plaintiff)

is a citizen of the United States and resides at _____

4113 Penwell Drive
(street address)

Horn Lake
(city)

Desoto
(country)

MS
(state)

38637
(zip code)

(901) 331-7432
(telephone number)

3. Defendant Sedgwick CMS

(defendant's name)
lives at, or its business is located at 2620 Thousand Oaks

(street address)
Suite # 2200
Memphis, TN 38118

4. Plaintiff sought employment from the defendant or was employed by the defendant at

2620 Thousand Oaks Suite # 2200
(street address)
Memphis Shelby (city) TN (state) 38118 (zip code)

5. Defendant discriminated against plaintiff in the manner indicated in paragraph 9 of this complaint on or about 12 June 2009

(day)

(month)

(year)

6. Defendant filed charges against the defendant with the Tennessee Fair Employment Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about

(day)

(month)

(year)

7. Plaintiff filed charges against the defendant with the Equal Employment Opportunity Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about

7
(day)

April
(month)

2010
(year)

8. The Equal Employment Opportunity Commission issued a Notice of Right to Sue, which was received by plaintiff on 28 Feb 2011. (Attach a copy of the notice to this complaint.)
(day) (month) (year)

9. Because of plaintiff's (1) ___ race, (2) X color, (3) ___ sex, (4) ___ religion, (5) ___ national origin, defendant

(a) ___ failed to employ plaintiff.

(b) X terminated plaintiff's employment.

(c) ___ failed to promote plaintiff.

(d) I was not treated fairly regarding my termination from Sedgwick CMS compared to a former white female employee Linda Litchman. (See attached letter for full detail and explanation of the matter please).

10. The circumstances under which defendant discriminated against plaintiff were as follows:

(See Attached letter)

11. The acts set forth in paragraph 9 of this complaint

- (a) ___ are still being committed by defendant.
- (b) ___ are no longer being committed by defendant.
- (c) ___ may still be being committed by defendant.

12. Please attach to this complaint a copy of the charges filed with the Equal Employment Opportunity Commission, which are submitted as a brief statement of the facts supporting this complaint.

WHEREFORE, Plaintiff prays that the Court grant the following relief to the plaintiff:

- (a) ___ Defendant be directed to employ plaintiff, or
- (b) ___ Defendant be directed to re-employ plaintiff, or
- (c) ___ Defendant be directed to promote plaintiff, or;
- (d) ☒ Defendant be directed to pay plaintiff monetary compensation for my pain, suffering and stressful ordeal.

and that the Court grant such other relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.

13. I would like to have my case tried by a jury. Yes ☒ No ()


SIGNATURE OF PLAINTIFF

4113 Penwell Dr
Horn Lake, MS 38637

May 17, 2011

Dear Sir or Madame:

I am writing on behalf of my case that was denied with EEOC. EEOC did explain to me fully of why my case was not in violation of a discrimination act against my former employer which was Sedgwick. However, it's still not justifiable. I understand that EEOC couldn't go back no more than a year in the investigation but if it could've been beyond that year, EEOC would have seen in the records where (Linda Litchman- a former sedgwick employee) had taken a numerous amount of leave of absence(s) from the job repeatedly for three months and greater and had exhausted her FMLA but yet she always had a job to go back to and in the same position as before she took the leave of absence from work.

In my case, I took a leave under short term disability from March 2009 to June 2009 and when June approached Sedgwick claimed that my job couldn't be held out for me any longer. But again, Ms. Linda Litchman repeatedly took a leave and I'm pretty sure she had exhausted her FMLA from Sedgwick on a numerous of occasions pertaining to her leave of absences. And I may add that Ms. Litchan's job was always there waiting on her return pertaining to the years of (2007, 2008, and 2009). Now Sedgwick did send Ms. Litchman a letter or called her by phone (in 2010) as they did me informing her that she needs to return back to work because her position can't be held. But to my understanding, that was the first time Sedgwick had informed her of that because usually during the years that Ms. Litchman took leave of absences multiple times, Sedgwick would always hold her position. Now, that's where the unjust plays a part in this. I want to know "why did Ms. Litchman have nothing said or done during her multiple episodes of being off work for months at a time while on short term disability during the years of 2007, 2008, and 2009 and Sedgwick just said something to her in 2010." But me, I was thrown out the door, so to speak, they first time that I was off work on short term disability. Again, to me that was very unfair and discriminative.

I would very much so like to see justice served correctly on my behalf. For any concerns regarding this letter, I can be reached at (901)331-7432.

Sincerely,

Gloria Taylor